

IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

In re: )  
)  
HASSAN M. AHMAD )  
Debtor ) Case No. 14-14380-RGM  
) Chapter 13  
)

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**MOTION TO COMPEL ORDER AUTHORIZING THE  
EXAMINATION OF THE DEBTOR PURSUANT TO  
BANKRUPTCY RULE 2004**

Shamsiya Shervani ("Ms. Shervani"), a creditor of the Debtor herein, by and through her undersigned counsel, moves this Court for the entry of an order authorizing counsel for Ms. Shervani to conduct a Rule 2004 examination of the Debtor, Hassan M. Ahmad, and to compel the Debtor to produce records/documents in connection therewith.

Ms. Shervani also requests that Debtor be required to provide the documents listed on Exhibit A attached hereto to counsel for Ms. Shervani not less than forty-eight (48) hours prior to the examination.

As there are no novel issues of law presented in this Motion, Ms. Shervani requests that the requirement that all motions be accompanied by written memorandum of law be waived.

Notice of this Motion is being provided pursuant to Local Rule 2001-1, and Bankruptcy Rules 2002 and 7004.

**Shamsiya F. Shervani**  
*By Counsel*

**O'CONNOR & VAUGHN LLC**

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By           /s/ Robert L. Vaughn, Jr.  
Robert L. Vaughn, Jr.  
*Counsel for Shamsiya Shervani*

Certificate of Service

I hereby certify that on January 3, 2015, I caused a true copy of this Motion to be served on all parties of record via the Court's ECF filing system and have mailed copies to:

Hassan M. Ahmad  
20620 Sutherlin Place  
Sterling, VA 20165

Robert R. Weed, Esq.  
45575 Shepard Drive, #201  
Sterling, VA 20164

Thomas P. Gorman, Trustee  
300 North Washington Street  
Alexandria, VA 22314

/s/ Robert L. Vaughn, Jr  
Robert L. Vaughn, Jr.

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
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**Exhibit A to Motion for 2004 Exam**

**DOCUMENTS TO BE PRODUCED AT RULE 2004 EXAMINATION**

1. Any and all bank statements for any and all financial accounts in the name of HASSAN M. AHMAD, individually, in conjunction with any third party (individual or entity), on which HASSAN M. AHMAD is entitled to draw, and/or in which HASSAN M. AHMAD has any interest, directly or indirectly, for the period January 1, 2010, to date. This request includes checking, savings, credit union, money market accounts, CD's mutual funds, stocks, bonds, other securities or bonds, and other securities or investment funds.

2. Any and all bank statements for any and all financial accounts in the name of THE HASSAN M. AHMAD LAW FIRM, PLLC d/b/a THE HMA LAW FIRM individually, in conjunction with any third party (individual or entity), on which HASSAN M. AHMAD is entitled to draw, and/or in which HASSAN M. AHMAD has any interest, directly or indirectly, for the period January 1, 2012, to date. This request includes checking, savings, credit union, money market accounts, CD's mutual funds, stocks, bonds, other securities or bonds, and other securities or investment funds.

3. Any word processing files, spreadsheets files, Quicken files, Microsoft Money files or other financial management programs for HASSAN M. AHMAD, covering the period January 1, 2012 up to and including the date of this Examination.

4. Any word processing files, spreadsheets files, Quicken files, Microsoft Money files or other financial management programs for THE HASSAN M. AHMAD LAW FIRM, PLLC d/b/a THE HMA LAW FIRM, covering the period January 1, 2012 up to and including the current date.

5. All federal income tax returns (including all schedules and attachments thereto) for HASSAN M. AHMAD for the period January 1, 2011, to date; in the event a return has not yet been filed for any portion of the foregoing time period, provide a copy of the records and/or documentation to be utilized in the preparation of the same.

6. All federal income tax returns (including all schedules and attachments thereto) for THE HASSAN M. AHMAD LAW FIRM, PLLC d/b/a THE HMA LAW FIRM , for the period January 1, 2011, to date; in the event a return has not yet been filed for any portion of the foregoing time period, provide a copy of the records and/or documentation to be utilized in the preparation of the same.

7. Any and all records or all gross receipts, disbursements, and accounts receivable and payable registers, ledgers, books and journals for HASSAN M. AHMAD for the period January 1, 2012, to the date of this Examination.

8. Any and all records or all gross receipts, disbursements, and accounts receivable and payable registers, ledgers, books and journals for THE HASSAN M. AHMAD LAW FIRM, PLLC d/b/a THE HMA LAW FIRM for the period January 1, 2012, to the current date.

9. All loan applications, financial statements, and/or statements of net worth prepared by or on behalf of HASSAN M. AHMAD filed, sent or used in the past 5 years to/by any lending or underwriting institution, as part of any stock prospectus, private placement memoranda and/or investor suitability statements and/or in any Court proceedings.

10. All loan applications, financial statements, and/or statements of net worth prepared by or on behalf of THE HASSAN M. AHMAD LAW FIRM, PLLC d/b/a THE HMA LAW FIRM filed, sent or used in the past 5 years to/by any lending or underwriting institution, as part of any stock prospectus, private placement memoranda and/or investor suitability statements and/or in any Court proceedings.

11. To the extent included within the foregoing, any and all documents of any kind or character and/or in any form (cash, check, credit card, money order, barter, etc.) which show any and all income received by HASSAN M. AHMAD for the period January 1, 2012 to the date of this Examination.

12. To the extent included within the foregoing, any and all documents of any kind or character and/or in any form (cash, check, credit card, money order, barter, etc.) which show any and all income received by THE HASSAN M. AHMAD LAW FIRM, PLLC d/b/a THE HMA LAW FIRM for the period January 1, 2012 to the date of this Examination.

13. Any and all documents which reflect, in any manner, any and all compensation paid in any shape, fashion or form to HASSAN M. AHMAD for the period January 1, 2012, to the date.